

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

EMMANUEL CORNET, JUSTINE DE)	
CAIRES, GRAE KINDEL, ALEXIS)	
CAMACHO, JESSICA PAN, EMILY KIM,)	
MIGUEL BARRETO, and BRETT)	
MENZIES FOLKINS, on behalf of)	
themselves and all others similarly situated,)	
	C.A. No. 1:23-cv-00441-TMH
Plaintiffs,)	
)
v.)
)
TWITTER, INC.,)	
)
Defendant.)	
)

**DECLARATION OF WALTER GILBERT IN SUPPORT OF DEFENDANT'S
OPPOSITION TO THE PRESS COALITION'S MOTION TO
INTERVENE AND FOR UNSEALING OF JUDICIAL RECORDS**

I, Walter Gilbert, declare as follows:

1. I am the Head of Human Resources & Recruiting for X Corp., the successor in interest to named defendant Twitter, Inc. ("Twitter"). I make this declaration in support of Defendant's Opposition to the Press Coalition's Motion to Intervene and for Unsealing of Judicial Records. This declaration is based on my personal knowledge, and if called to testify I am competent to testify on the matters stated.

2. Each of the claimants in the arbitrations whose awards the Press Coalition seeks to unseal voluntarily signed a Dispute Resolution Agreement ("DRA") as part of their employment. Each of the DRAs signed by the claimants contain the following provision:

The Arbitrator will issue a decision or award in writing, stating the essential findings of fact and conclusions of law. Except as may be permitted or required by law, as determined by the Arbitrator, neither a party nor an Arbitrator may disclose the existence, content, or results of any arbitration hereunder without the prior written consent of all parties.

3. Defendant is participating in ongoing arbitrations with former employees of Twitter. If the documents the Press Coalition seeks to unseal are made public, Defendant will have no confidence that the existence, content, or results of those arbitrations will remain confidential as the parties agreed.

4. Unsealing those documents would fundamentally frustrate the core purpose of the confidential arbitration process Defendant and the former Twitter employees agreed to, and would cause serious injury to Defendant.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on the 8th of April, 2025.

Signed by:

Walter Gilbert
OEC9114F4687427...
Walter Gilbert